

Before the  
**Federal Communications Commission**

Washington, D.C. 20554

In the Matter of )  
 )  
Amendment of Section 73.202(b) )  
(Table of Allotments) )  
FM Broadcast Stations )  
 )  
Port St. Joe and Parker, Florida )

MM Docket No. \_\_\_\_\_  
RM- \_\_\_\_\_

**RECEIVED**  
**MAR - 4 1994**  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

TO: Chief, Mass Media Bureau  
Policy and Rules Division  
Allocations Branch

**PETITION FOR RULE MAKING**

Southern Broadcasting Companies, Inc., ("SBC"), licensee of WPBH(FM), Port St. Joe, Florida,<sup>1</sup> by its attorneys, and pursuant to Section 1.420(i) of the Commission's Rules, hereby respectfully requests the Commission to amend Section 73.202(b) of the Rules to (a) delete Channel 233 from Port St. Joe, Florida; (b) add Channel 233 to Parker, Florida; and (c) modify the license for WPBH(FM), Port St. Joe, Florida, to specify "Parker, Florida" as its community of license. In support whereof, the following is shown:<sup>2</sup>

<sup>1</sup> The station's call sign was formerly "WKNB". A request for change of call sign was granted by the Commission on March 4, 1994. On October 29, 1993, SBC filed an application seeking an assignment of license of the former WKNB from Asterisk Broadcasting, Inc. ("Asterisk"). See File No. BALH-931029GN. The application was granted on January 25, 1994, and the transaction was consummated on March 1, 1994.

<sup>2</sup> On November 5, 1993, SBC submitted a similar Petition For Rulemaking seeking the same changes to the FM Table of Allotments. This Petition was returned by the Allocations Branch via Letter on December 16, 1993 (RM-8381 - 18000D5). The Allocations Branch found that: "...we are unable to make an initial determination that the proposal would result in a preferential arrangement of allotments." The Allocations Branch stated that SBC's Petition "includes no information which enables us to determine...whether Parker is deserving of a first local service preference or whether that community should be

**SBC's Proposal Would Result in a  
Preferential Arrangement of Allotments**

1. WPBH operates on Channel 233 at Port St. Joe, Florida. SBC requests the Commission to delete Channel 233 from Port St. Joe and to reallocate it to Parker, Florida, with a concurrent modification of license of WPBH to operate on Channel 233 at Parker, Florida. This change is permissible under Section 1.420(i) of the Rules, which authorizes the Commission to modify the license or permit of an FM station to specify a new community of license where the amended allotment would be mutually exclusive with the licensee's present allotment.

2. Two factors must be demonstrated in order to change a station's city of license in a rule making proceeding: (1) the channel changes must be mutually exclusive, and (2) the rule making must not deprive a community of an existing service representing its only local transmission service. The Commission stated that in making the determination of whether to amend the Table of Assignments it would "take into account the totality of the service improvements resulting from a proposed change in community of license in determining whether an allotment proposal should be approved." See Modification of FM and TV Authorizations (New Community of License), 4 FCC Rcd 4870 [66 RR 2d 877] (1989). As is demonstrated herein, SBC's proposal is consistent with the Rule and Commission policies.

3. Attached hereto as Exhibit 1 is a copy of SBC's Technical Exhibit, which is

---

credited with all of the aural services authorized in the Panama City Urbanized Area...." The Letter stated that SBC was free to resubmit its Petition in accordance with the criteria outlined therein. The instant filing contains additional information responsive to the Commission's concerns. Attached as Exhibit 1 is a photocopy of the Technical Exhibit that was contained in SBC's original Petition.

incorporated herein by reference, which provides the Commission with information about the proposed Port St. Joe/Parker channel exchange.

#### **Port St. Joe, Florida**

4. As stated in the Technical Exhibit, Port St. Joe had a 1990 population of 4,044. Port St. Joe has two commercial broadcast stations, WMTO(FM), and WPBH.<sup>3</sup> WPBH would continue to provide regional service to Port St. Joe.

#### **Parker, Florida**

5. As outlined more fully below, Parker is an incorporated city which had a 1990 population of 4,598. Parker employs a full-time city manager, police department, and public works department. Parker is the oldest city in Bay County, Florida. See Exhibit 2 attached hereto. WPBH would bring first local service to Parker, since Parker currently does not have a local station.

#### **Other Public Interest Considerations**

6. In changing its city of license, WPBH will not be required to relocate its transmitter site. WPBH will continue to provide its current signal strength to the residents of Port St. Joe. Since Port St. Joe will continue to receive local service from WMTO, SBC's proposal will not deprive Port St. Joe of its only local transmission service.

7. As shown in the attached Technical Exhibit, Parker is entirely covered by a 70 dBu or better signal from WPBH(FM). Thus, modification of the license for WPBH would

---

<sup>3</sup> At one time, Port St. Joe had three local stations; however, the license for WJOE(AM), Port St. Joe, Florida, was surrendered for cancellation November 30, 1992.

be consistent with the Commission's city-grade contour coverage requirements.

8. The proposals for Port St. Joe and Parker are mutually exclusive.

9. The Commission's priorities for assigning FM allotments are set out in Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 92 [51 RR 2d 807] (1982).

They are: (1) first aural service, (2) second aural service, (3) first local service, and (4) other public interest matters. Co-equal weight is given to priorities (2) and (3). Here, first local service to Parker is preferred to second local service to Port St. Joe. Thus, there would be a public interest benefit resulting from the allotment of Channel 233 to Parker.

**Parker Is Not Part of An "Urbanized Area"**

10. In its December 16, 1993, Letter<sup>4</sup> to SBC's counsel, the Allocations Branch noted that Parker, Florida, is located within the Panama City, Florida, "Urbanized Area." The Allocations Branch therefore determined that SBC's proposal must be evaluated pursuant to the Commission's criteria for awarding a first local service preference to a community in an Urbanized Area.<sup>5</sup> SBC disagrees with the Allocations Branch's belief that Parker is located within the "Panama City, Florida, Urbanized Area." The evidence suggests that no such Urbanized Area exists.

11. Attached as Exhibit 3 is a copy of a letter from Girard L. Clemons, Jr., Mayor of Panama City, Florida. Mr. Clemons states that: "The City of Parker is not a part of Metropolitan Panama City or of the urban sprawl of Panama City. Furthermore, Panama

---

<sup>4</sup> This letter is described in Footnote 2 of this Petition.

<sup>5</sup> This policy is described in RKO General, Inc. (KRFC), 5 FCC Rcd 3222 (1990), and Faye and Richard Tuck, 3 FCC Rcd 5374 (1988).

City provides no municipal services to the City of Parker. Parker is a wholly functioning independent city." The mayor of Panama City does not consider Parker to be part of an "urbanized area", so there is great doubt that such an area exists.

12. Also attached as Exhibit 2 are materials that describe Parker. The materials show that Parker is located in the Southeastern area of Bay County, Florida, and its formation actually pre-dates the six other communities that comprise Bay County; i.e. Panama City, Lynn Haven, Springfield, Millville, Panama City Beach and Callaway. Parker was created in 1835, took its present name in 1887 and was incorporated in 1967. Panama City was not created until 1909. Parker is physically separated from Panama City by two other incorporated municipalities - Springfield and Callaway. See Exhibit 4, letter of John G. Hindsman, III.<sup>6</sup>

13. Mr. Hindsman explains that there is no "urban area" serving the six incorporated communities in Bay County, Florida. Mr. Hindsman concludes that the six small cities and one large unincorporated area that comprise Bay County, Florida, "are completely independent of each other." Mr. Hindsman states further that "This is not an 'urban' or 'metro' city serving smaller cities. It is...a collection of six small, independent cities. And it is this way at the demand of the population at large." Mr. Hindsman cites recent attempts to consolidate local services as an example of how fiercely independent each of these communities have become. The Bay County Charter Study Committee investigated the possibility of all six cities consolidating municipal services (fire, police, water, sewer, etc.)

---

<sup>6</sup> Mr. Hindsman is a Parker area citizen and was Chairman of the Bay County Charter Study Committee in 1975-1976. This was a committee of the Bay County Board of Commissioners, the entity which oversees those unincorporated portions of Bay County.

into one "county-wide" service for cost-saving purposes. At that time, and again in 1986 and 1992, this idea was flatly rejected by the citizens of these cities.

14. As these facts show, the various municipalities of Bay County, including Parker, are completely independent of one another and do not comprise one large Panama City "Urbanized Area". Therefore, Parker, Florida, is a separate community for allotment purposes, and SBC's proposal deserves a "first local service" preference.

#### **Parker Is An Independent Florida City**

15. There is persuasive evidence to demonstrate Parker's complete independence from the other neighboring cities. The Commission examines reallocation proposals that involve a community in an "Urbanized Area" against three criteria to determine if a first local service preference is warranted. In essence, these criteria examine the degree of interdependence (if any) the proposed "suburban community" has with the nearby central city. For example, the criteria examine: (a) population coverage to both the proposed suburban community and adjacent central city; (b) size of the suburban community versus the size of the central city; and, most importantly, (c) the interdependence of the suburban community to the central city. (See cases cited in footnote 5.)

#### **Service To Parker Versus Service To Panama City**

16. Under the Commission's first criteria, as demonstrated in Exhibit A, the entire city limits of Parker will be served by the principal community contour (3.16 m/Vm) of WPBH. Only a small portion of Panama City will be served by WPBH's principal community contour. Therefore, with the allotment of Channel 233 to Parker, WPBH would serve the city of Parker with a better signal than the community of Panama City.

### **Population of Parker versus Panama City**

17. Under the second variable, the 1990 population of Panama City was 34,378.<sup>7</sup> The 1990 population of Parker was 4,598.<sup>8</sup> Moreover, Parker is **non-contiguous** to Panama City and is physically separated by both Springfield and Callaway, Florida.

### **Parker's Independence From Panama City**

18. Finally, the most important of the Commission's criteria is whether the suburban community is interdependent with another nearby city. In this case, the Commission examines "evidence related to work patterns, media and community services and the opinion of suburban residents." (FCC December 16, 1993, letter at p. 1.) Attached hereto is extensive evidence that the city of Parker, Florida, is a separate thriving community and not dependent on Panama City, Florida.

19. Attached as Exhibit 5 is a letter dated December 30, 1993, of Brenda Hendricks, the Mayor of Parker. Mayor Hendricks states that: "The City of Parker did not come about due to the 'urban sprawl of Panama City' and Parker is no way dependent upon the City of Panama City." As Mayor Hendricks notes, "Parker, an incorporated municipality, was organized in 1835 and is the oldest community in Bay County." Parker was incorporated in 1967. Panama City was not created until 1909.

---

<sup>7</sup> Population figure from 1990 Census.

<sup>8</sup> The Commission has made allotments to communities with much smaller populations than Parker's. See, Amendment of FM Table of Allotments (Princeville, HI), 5 FCC Rcd 590 (N.M.B. 1990)(population 500); Amendment of FM Table of Allotments (Semora, NC), 67 RR 2d 610 (1990)(population 150); Amendment of FM Table of Allotments (Evans, GA), 4 FCC Rcd 7926 (M.M.B. 1989)(population 800); Amendment of FM Table of Allotments (Virgie, KY), 4 FCC Rcd 7475 (M.M.B. 1989)(population 800).

20. As Mayor Hendricks notes, Parker has its own full-time Fire Chief, Police Department, Parks Department, Street Department and Library and provides its citizens with water and sewer services through a franchise with Bay County. Therefore, Parker is not dependent upon Panama City for any services it provides to its citizens. (Exhibit 5, p. 2.) This is the case with all of the other cities situated in Bay County. Attached as Exhibit 6 are letters from the mayors of each of the cities in Bay County. In each case, the mayor states that his or her city is independent and does not rely upon Panama City for services.

21. Further, Parker is home to numerous businesses, churches and civic organizations, many of which have the name "Parker" in their title. (See Exhibits 5 and 7.) Parker has its own full-time Mayor, City Commission and paid City Clerk. As this evidence indicates, Parker is a wholly-separate Florida community which is deserving of its own first local radio service.

### **Conclusion**

22. SBC has clearly demonstrated that Parker, Florida, is a community that deserves its first local aural service. SBC's proposal will bring this first service to Parker with no loss of service to the community of Port St. Joe. Therefore, SBC respectfully requests that the Commission accept this Petition For Rulemaking and issue a Notice of Proposed Rulemaking.

**WHEREFORE, SBC respectfully requests the Commission to amend Section 73.202(b) of its Rules, as follows:**


Florida

	<u>Present</u>	<u>Proposed</u>
Port. St. Joe	228C2, 233C	228C2
Parker	----	233C

SBC also requests the Commission to modify the license of WPBH to operate on FM Channel 233C at Parker, Florida. Upon allotment of Channel 233 to Parker, SBC will promptly file an application for construction permit or license, as directed, to modify WPBH's license to operate as a Parker station.

Respectfully submitted,

**SOUTHERN BROADCASTING COMPANIES, INC.**

By:   
\_\_\_\_\_  
Gary S. Smithwick  
Shaun A. Maher

Its Attorneys

**SMITHWICK & BELENDIUK, P.C.**  
1990 M Street, N.W.  
Suite 510  
Washington, D.C. 20036  
(202) 785-2800

March 4, 1994

**EXHIBIT 1**

**TECHNICAL STATEMENT FROM**  
**PETITION FOR RULEMAKING SUBMITTED NOVEMBER 5, 1993**

**TECHNICAL EXHIBIT**  
**SOUTHERN BROADCASTING COMPANIES, INC**  
**PETITION FOR RULEMAKING**  
**CHANGE CITY OF LICENSE**  
**WKNB - PORT ST. JOE, FL.**  
**TO PARKER, FL.**

This technical exhibit is offered in support of a petition for rulemaking to change city of license of radio station WKNB, now licensed to Port St. Joe, Florida, to Parker, Florida.

Offered as exhibit-2 is a map showing both the incorporated city limits of Parker, Florida and the 70 DB/u (3.16mV/m) contour of WKNB from it's present tower location. This exhibit clearly shows that Parker will be fully encompassed within the 70 DB/u contour, and in full compliance with CFR 73.315 of the Commissions rules. WKNB presently operates as a class C facility on channel 233. The antenna center of radiation is 281m above average terrain and 328m above mean sea level.

Parker, Florida is located in the southeast coastal area of Bay County and presently has a population of 4,598 residents according to the 1990 census and 4,600 as estimated by Parker Chamber Of Commerce. Parker is a fully incorporated city, employing a full time City Manager, Police Department, and Public Works Department. Parker is the oldest city in Bay County and one of the oldest cities in Florida. Parker is governed by a Mayor and five elected members of city council. According to the 1990 census data, Port St. Joe has a population of 4,044 and is declining.

Port St. Joe, Florida presently is served by two aural services including WKNB. Also licensed to Port ST. Joe is WMTO(FM), operating as a C2 facility with 14.5kw ERP and an antenna height of 204m amsl. Parker presently has no local service of any kind, therefore, the public interest would be better served by changing the city of license of WKNB to Parker, leaving Port ST. Joe with two aural services.

Respectfully submitted:



Clyde Scott, Jr.  
EME Communications

WKNB 70 DB/u  
(3.16 mV/m) CONTOUR

PARKER, FL.  
CITY LIMITS

KILOMETERS

2 0 2 4 6

EME COMMUNICATIONS  
Consulting Engineers  
MOLTRIE, GEORGIA, U.S.A.

PLOT IS 1:100,000 SCALE

PARKER, FL CITY LIMITS

PLOT SHOWING 3.16 mV/m - WKNB

10/21/93

EXHIBIT-2

AFFIDAVIT AND QUALIFICATIONS OF PREPARER

STATE OF GEORGIA )  
CITY OF MOULTRIE )  
COLQUITT COUNTY )

SS:


CLYDE SCOTT, JR. FIRST BEING DULY SWORN, DEPOSES AND SAYS HE IS A BROADCAST ENGINEER AND PRESIDENT OF EME COMMUNICATIONS. HE HAS BEEN ENGAGED TO PREPARE THE ATTACHED TECHNICAL EXHIBIT

THAT HIS QUALIFICATIONS ARE A MATTER OF RECORD BEFORE THE FEDERAL COMMUNICATIONS COMMISSION AND HAS BEEN ACTIVE IN THE BROADCAST INDUSTRY SINCE 1965 AND IN BROADCAST ENGINEERING SINCE 1972. THAT HE IS THE HOLDER OF GENERAL RADIOTELEPHONE LICNESE NO. PG-6-30133.

THAT THE ATTACHED TECHNICAL EXHIBIT WAS EITHER PREPARED BY HIM OR UNDER HIS DIRECT SUPERVISION. ALL MATERIAL AND EXHIBITS HERETO ARE BELIEVED TO BE TRUE AND CORRECT.

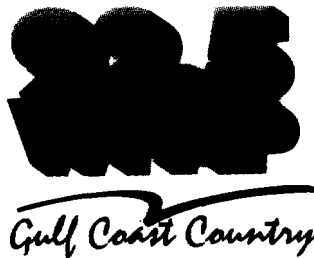
  
CLYDE SCOTT, JR.  
AFFIANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS  
NOVEMBER 4TH, 1993

  
Notary Public, Colquitt County, Georgia  
My Commission Expires October 7, 1995

**EXHIBIT 2**

**CITY OF PARKER, FLORIDA: AN HISTORICAL PERSPECTIVE**



December 28, 1993

#### **CITY OF PARKER, FLORIDA: AN HISTORICAL PERSPECTIVE**

The City of Parker, located in the Southeastern area of Bay County, Florida, actually pre-dates the cities of Panama City, Lynn Haven, Springfield, Millville, Panama City Beach and Callaway (all of the current municipalities of Bay County). Parker dates to 1835 when it was known first as "Austerlitz". It was officially renamed "Parker" in 1887 in honor of a prominent local family.

Panama City is actually the "newest" city in Bay County. It was created in 1909 by a group of businessmen from the North who wanted to develop a new shipping port in the Southeast along the Gulf Coast. At that time, Millville, Parker, Springfield and Lynn Haven had functioned as communities for a long number of years.

Parker was officially incorporated in 1967. Until that time it functioned as part of the "unincorporated area" of Bay County. Springfield (another incorporated city) physically separates Panama City and the City of Parker.

Employment in Parker is derived primarily from Tyndall Air Force Base and Stone Container (paper mill). The Air Force Base is separated from Panama City by Springfield, Parker and Callaway. The paper mill is located outside the city limits of Panama City. Parker is home to more that 500 small businesses, restaurants, shopping centers and professional offices.

Parker considers itself a city of projected growth and opportunity both in business development and residential development. (see attached letter from Mayor of Parker)

Parker is "home" to almost 100 churches and civic groups.

(See attached references from "GLIMPSES OF THE PANHANDLE PAST" 1939, written by Harold W. Bell)

## Chapter 10

### Part 1

#### PARKER COMMUNITY FIRST NAMED AUSTERLITZ

Few persons know that the great French leader, Napoleon Bonaparte, was responsible for the naming of Parker, one of Bay County's oldest communities.

The East Bay community first was known as "Austerlitz" in honor of a decisive battle won by Napoleon over the combined Austrian and Russian armies at a city named Austerlitz in 1805.

But for the story of how Parker came by its Austrian name it is necessary to go back to the year 1813 and the tiny German village of Dantzie.

A boy, Peter Parker, was born there in 1813. Coming to this country as a stowaway on a ship when a teenage boy, Parker, turned up in the region later to be called St. Joseph. He then came to the new community of Austerlitz about the year 1836 where he soon married a daughter of William Loftin, who had been one of the leading men in surveying and organization of the community.

According to historical accounts of Judge Ira Hutchison and Mrs. Mattie Spicer, now 79 and a resident of Parker all her life, many interesting facts have been made available.

In the year 1835, William Loftin, who was a planter and surveyor in North Carolina, visited the St. Andrew Bay area and later settled here near the home of John Clark. Clark was a former governor of the state of Georgia who had moved to this region where he became an influential and progressive leader of the community.

Loftin was awarded title from the United States Government to a tract of 80 acres of land which was to become the community of Parker much later. Colonel David H. Horne, also a surveyor and landowner, helped Loftin plat the area known as Old Town (St. Andrew) and then the future Parker community.

This area was first called "Austerlitz." A check of present day Europe shows this town to be in Czechoslovakia now.

Great hopes were held by Loftin and a few New England capitalists and promoters for this new community to become the capitol of the Florida Territory. Before many new settlers came to the new village, the tides of business fortunes and the visions of an even greater town to the east to be known as St. Joseph, the Austerlitz community was doomed to become merely a little

fishing village with not many families living in the region. During the War Between the States when the Confederate salt mines on the west shores of St. Andrew Bay played such an important part in the producing and distribution of salt to the Southern forces, this small village remained *status quo* and continued to do so until about the time of the famous "Cincinnati Boom" in 1887-88.

Mrs. Spicer is a granddaughter of the Peter Parker, Sr., mentioned before. Parker became involved in the main trade of this region, namely fishing, and made many trips to various south Alabama communities where he would sell wagonloads of salt fish. On one of these trips up to the area near Dothan, Alabama, he met his future wife who was one of a family named "Folkes." To this union were born two sons, John and Charlie Parker. Mrs. Spicer and Mrs. Arthur Pratt, both of whom live in the Parker community today, are daughters of John Parker. This family has been residents here for all these years.

Many persons in the 1880's responded to advertisements lauding the St. Andrew Bay area, and one group to come here was the W. P. Parker family, which was no relation to Peter Parker. Most of the families first came to Pensacola and made their way here by boat. The new Parker family and the Percival family were to play a leading role in the community later to be known by the former name.

Dr. W. P. Parker, who owned about 40 acres of land where part of the Parker community is located, and his son, W. H. (Will) Parker, became the first general merchants and postmasters of the community. In 1887, the plats of the Parker area were re-established by drawings made by Colonel D. H. Horne from memory because the original plats had been lost many years before.

A check made at the Bay County Courthouse several months ago shows the drawings of the originals (a photostatic copy). This survey was made in January, 1887, and it showed the streets to be 66 feet wide and with the eastern boundaries of Parker to be Tierson Bayou. Parker was surveyed with 16 blocks comprising the community. The Parker Cemetery is in the third block of the platted area. According to the official records, this plat was made for the heirs of W. J. Loftin, Charles T. Porter, and Henry L. Revier.

With the community known as Austerlitz from 1835 until 1887, an interesting fact is related by Mrs. Will Parker as to the way the community and post office came to be named Parker. Up to and including the year 1886, the community was widely

scattered with only a half dozen or so families living in a two-square-mile area. As stated before, the community was called Austerlitz previous to the coming of the W. P. Parker family in 1887.

On a visit of a postal inspector, the discussion came up relative to the future status, name, etc., of the community after the plats had been reviewed for three families which were landowners in the community. As it happened, the postmaster, W. P. Parker, and the postal inspector, whose name was also Parker, decided to change the community's name to Parker, which it has retained for the past 72 years.

The only business house which could be classed as a "general store" was owned and operated by the family from 1908 until many years later. In addition to general merchandise, Mrs. Parker said that many men would come down from south Alabama and buy barrels of salt fish and then peddle them out on their return trip home.

Except for one period of approximately 10 years between the turn of the century and the year 1945, the postmaster's job has been in the W. H. Parker family. The total number of years with the family being in the post office is nearly 38, which is close to a record of some kind. When Mrs. Parker assumed the job in 1919, she remained on the job until her retirement on October 31, 1945, when Mrs. Rosa Pennington took over.

And so it goes that this present thriving and fast-growing community is really quite a bit older than Lynn Haven, Millville, and Panama City. With a larger number of permanent residents now than ever before and a normal and natural shifting of military personnel, the community atmosphere is one of anticipation of continued and greater progress in all fields. A progressive school, two fast-growing churches, an active Masonic Lodge, a Men's Club, and several women's organizations, Parker is definitely on the move.

## Part 2

### PARKER LODGE ORGANIZED IN 1892

#### Was First in Bay Area

There are five active Free and Accepted Masonic Lodges in Bay County with a total membership estimated at 1,400. The history of the organization in Bay County runs 68 years.

The first area in the county to establish a Masonic lodge was Parker, in 1892.

During the twenty-five-year period following the Civil War several northern families settled in the upper part of Bay County—at that time the lower part of Washington County. These families had come from a section of the country where fraternal organizations of various kinds had been a way of life for many years.

Many of the northerners established themselves as leaders in the civic, social, political and religious facets of the community. In the small Parker community there began a growing demand for a kind of community group which would help bring closer relationship with other settlements on St. Andrew Bay.

In 1892, an organizational meeting was held in Parker which resulted in the establishment of Lodge No. 142. Two years later, the lodge received its full charter.

Elected to head the new organization was Colonel S. T. Walkley of the Cromanton community, and a native of Illinois. (The writer received a letter from him recently. Now 94 years old, he lives in Kansas.)

Will H. Parker, who served as Worshipful Master of the lodge for 23 years, constructed the first Masonic building in the county. The structure endured as a familiar landmark in Parker until being dismantled three years ago. The building which stood for 63 years adjoined a general store and post office.

Floyd Davis, of Parker, drawing on his knowledge of Masonic history, relates that the monthly meetings at Parker were held on Saturday afternoon, during which time the members mingled with other people in the area gathering around the general store and post office. Sailboats were docked around the lodge, he recalls.

Members from Parker, Cromanton, San Blas, Callaway and Bellisle attended the meetings.

Some of the early members of the lodge were W. H. Parker, Peter F. Parker, J. T. (Jim) Holmes, H. M. Spicer, R. E. Palmer, E. Palmer, E. J. Fox, Charles Forbes, A. R. Spicer, W. H. Freeman, J. T. Sheffield and Tyler Fox.

World War I greatly affected several fraternal organizations in Bay County. Some ceased to exist because of the decline in memberships, along with other reasons. Lynn Haven's lodge folded several years later during the early part of the depression. Unity Lodge No. 218 of Lynn Haven lost its charter due to the drastic decline in its membership.

For twenty years, the Masonic order in Lynn Haven ceased to exist, but in 1952 an attempt was made to reorganize it. Upon

**EXHIBIT 3**

**COPY OF LETTER FROM MAYOR OF PANAMA CITY**

## CITY OF PANAMA CITY

GERRY CLEMONS  
MAYOR

March 3, 1994

Lyn Hindman  
Vice President/General Manager  
Caller Box 2288  
Panama City, FL 32402

Dear Lyn:

The intent of this letter is to verify that the City of Parker is not a part of metropolitan Panama City or of the urban sprawl of Panama City. Furthermore, Panama City provides no municipal services to the City of Parker. Parker is a wholly functioning independent city.

If you need any further information, please give me a call.

Sincerely,

  
Gerry Clemons, Jr.

GLC/eps

**EXHIBIT 4**

**LETTER OF JOHN G. HINDSMAN, III**

January 3, 1994

Paul Stone  
Southern Broadcasting Companies, Inc.  
Caller Box 2288  
Panama City, FL 32404

Dear Mr. Stone:

I was the appointed Chairman of the Bay County Charter Study Committee in 1975-76. I and a group of citizens were appointed by the Bay County Board of Commissioners to prepare a full-fledged study of the financial feasibility of combining all of the Police Departments, Fire Departments, Street Departments, Water & Sewer Services and Parks Departments into a consolidated "county-wide" approach. While each of the six incorporated cities in Bay County provide these services independently to the various cities, it was felt that a substantial savings of cost and improved quality of service might be afforded on a consolidated county-wide system.

I doubt that I have ever experienced less success or more back-lash on any community endeavor I have ever been associated with in Bay County. While our project was funded (for study purposes), the completed report (which highly recommended county-wide consolidated services) was met with extreme disapproval by all of the six cities in Bay County as well as the population at large.

Bay County is comprised of six municipalities and a large unincorporated area. These six small cities are completely independent of each other. The unincorporated area is served by the Bay County Board of Commissioners. And that's the way it will remain for the foreseeable future. This is not an "urban" or "metro" city serving smaller cities. It is, as I've stated, a collection of six small, independent cities. And it is this way at the demand of the population at large.

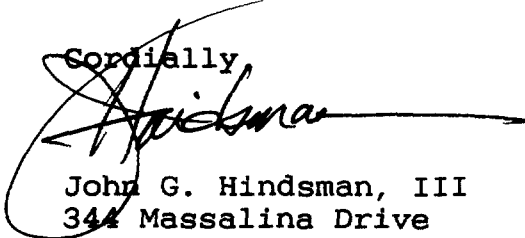
Paul Stone  
Southern Broadcasting Companies, Inc.  
January 3, 1993  
Page 2

Each of the two studies which followed ours (1986 and 1992) met with exactly the same resistance.

I hope this information answers your question about Panama City serving the surrounding cities. It just isn't so.

Thank you for your interest.

Cordially,



John G. Hindsman, III  
344 Massalina Drive  
Panama City, FL 32401

**EXHIBIT 5**

**LETTER OF BRENDA HENDRICKS, MAYOR OF PARKER, FLORIDA**



# CITY OF PARKER

BRENDA HENDRICKS  
MAYOR

WILMER JONES  
COUNCILMAN

ROBERT LEE  
COUNCILMAN

BO SECHREST  
COUNCILMAN

LEONARD SMITH  
COUNCILMAN

POST OFFICE BOX 10745

PARKER, FLORIDA 32404

December 30, 1993

Lyn Hindsman  
Vice President/General Manager  
Southern Broadcasting  
1834 Lisenby Ave.  
Panama City, FL. 32405

Dear Mrs. Hindsman,

The City of Parker did not come about due to the "urban sprawl of Panama City" and Parker is no way dependent upon the City of Panama City.

Parker, an incorporated municipality, was organized in 1835 and is the oldest community in Bay County. We are physically separated from Panama City by two other incorporated municipalities, Springfield and Callaway.

The City consists of a mixture of residential properties and businesses, churches and long established civic organizations. Although the City is surrounded by two (2) bodies of water there are still undeveloped areas which may provide growth for both business and residential growth. The current population of our community is 4,598. The City employs a full-time Fire Chief, Police Department, Parks Department, Street Department, Library, and provides our residents with full water and sewer services through a franchise with Bay County.

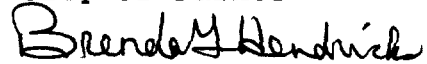
We are a progressive City in the midst of constantly upgrading and improving services to enhance our community. At this point in time, we are ready to begin construction of a major athletic facility that will provide much needed services for other communities and organizations in Bay County.

Parker is a proud City. Our elected City Commission, full-time Mayor and paid City Clerk work hard to provide for the needs of our citizens.

Please be assured. We are not reliant upon the City of Panama City for any services for our citizens.

Sincerely,

City of Parker

A handwritten signature in cursive script, reading "Brenda G. Hendricks". The signature is written in dark ink and is positioned above the printed name and title.

Brenda G. Hendricks  
Mayor